

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001**

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2012

DOCKET NO. N2012-1

**INTERROGATORIES OF THE NATIONAL NEWSPAPER ASSOCIATION
TO UNITED STATES POSTAL SERVICE
(March 30, 2012)**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, National Newspaper Association (NNA) submits institutional interrogatories and requests for documents to the United States Postal Service. Document requests include requests for responsive information for any record within the Postal Service's possession, whether in printed or electronic form.

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Respectfully submitted,
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NNA/USPS -1

Please refer to the Postal Service's filing of June 25, 2010 in Docket RM 2010-11 titled UNITED STATES POSTAL SERVICE RESPONSE TO ORDER NO. 465 AND REQUEST FOR SEMI-PERMANENT EXCEPTIONS FROM PERIODIC REPORTING OF SERVICE PERFORMANCE MEASUREMENT, pages 7 to 10 and respond to the following questions:

- a. Does the Postal Service still believe measurement of Periodicals as a total class provides an adequate proxy for measurement of Within County Periodicals service performance?
- b. Does the Postal Service still believe Within County Periodicals are less likely than Outside County Periodicals to be able to make the transitions to bar-coding that would enable product measurement?
- c. Does the Postal Service have any data to demonstrate the percentage of mail undergoing manual handling in the Within County product class that consists of newspapers? If so, please provide those data. If not, does the Postal Service believe newspapers constitute all or almost all of the product class?

NNA/USPS -2

Please review the Postal Services filing of July 10, 2010, in Docket RM 2010-11 entitled UNITED STATES POSTAL SERVICE NOTICE OF FILING SUPPLEMENTAL INFORMATION that contained the report entitled, "Community Newspapers Study Highlights" and respond to the following questions:

- a. Please confirm that the report was prepared by the Global Business Services division of IBM under the Postal Service's direction.
- b. Please confirm that the study leading to the report was conducted in 2008 in cooperation with the National Newspaper Association.
- c. Please confirm that the start-the-clock critical entry time used in this study was 5 p.m.
- d. Has the Postal Service done any analyses since the conclusion of this study of potential outcomes if a test were made using earlier critical entry times?
- e. Please refer to p. 10 of the report. Confirm that the average on-time arrival of Periodicals reported in this study was

- a. 82.2% on time for Within County Periodicals destined for within county addresses
 - b. 65.85% for addresses outside the county but within the mailer's market
 - c. 58.38% for addresses outside the county but within the postal area
 - d. 54.19% on time for addresses outside the county and outside the postal area.
- f. Please confirm that the report stated that the mailer's choice of containers (i.e. sacks, pallets, tubs, etc) did not establish a clear relationship to the service times.
- g. Please refer to p. 18. Confirm that while Destination Entry Within County Periodicals had similar on-time scores to Outside County Periodicals, the on-time scores for Origin Entry mail were 60.52% and 68.11% respectively.
- h. Please refer to p. 23. Confirm that the report suggested using Outside County Periodicals scores as a proxy for Within County Periodicals.
- i. Please refer to p. 23. Confirm that the report suggested considering another study in "a few years." Has the Postal Service considered another study?